

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

HOLCOMBE, et. al,

Plaintiffs

vs.

UNITED STATES OF
AMERICA,

Defendant

NO. 5:18-CV-00555-XR

(consolidated cases)

**PLAINTIFFS' COUNTER-DESIGNATION OF DEPOSITION
TESTIMONY OF ACADEMY WITNESS (R.C.)**

Plaintiffs file the following counter-designation of testimony by Academy Witness R.C. and hereby designate the following pages and lines of the referenced deposition to be used at trial in response to the designations offered by Defendant United States.

Plaintiffs do not include in their designations any objections or attorney commentary that may fall within the page and line references.

The underlying deposition testimony is subject to the Protective Order entered by the Court [Doc. 184-1]. Therefore, in accordance with the Protective Order, the complete text of the designated testimony and official transcript pages are being separately provided to the Court.

Plaintiffs' Counter-Designation of
Deposition Testimony of Academy Witness R.C. [11/13/2018]

6:14-16

9:13-18

11:24-12:5

43:14-21

89:23-90-9

28:21-29:7

Respectfully Submitted,

/s/ Jamal K. Alsaffar

Jamal K. Alsaffar

JAlsaffar@nationaltriallaw.com

Texas Bar No. 24027193

Tom Jacob

TJacob@nationaltriallaw.com

Texas Bar No. 24069981

**Whitehurst, Harkness, Brees, Cheng,
Alsaffar & Higginbotham & Jacob
PLLC**

7500 Rialto Blvd, Bldg. Two, Ste 250

Austin, TX 78735

Office 512-476-4346

Fax 512-476-4400

Counsel for Vidal, McKenzie, Solis,
McNulty, and Wall

/s/ Jason P. Steed

Jason P. Steed

JSteed@kilpatricktownsend.com

Texas Bar No. 24070671

**Kilpatrick Townsend & Stockton
LLP**

2001 Ross Avenue, Suite 4400

Dallas, TX 75201

Office 214-922-7112

Fax 214-853-5731

Counsel for Vidal, McNulty, and Wall

/s/ April A. Strahan

April A. Strahan

april@ammonslaw.com

Texas Bar No. 24056387

Robert E. Ammons

rob@ammonslaw.com

Texas Bar No. 01159820

The Ammons Law Firm

3700 Montrose Blvd.

Houston, TX 77006

Office 866-523-1603

Fax 713-523-4159

Counsel for Holcombe, Ramsey, Curnow
& Macias

/s/ Daniel J.T. Sciano

Daniel J.T. Sciano

DSciano@tsslawyers.com

Texas Bar No. 17881200

Tinsman & Sciano

10107 McAllister Freeway

San Antonio, TX 78216

Office 210-225-3121

Fax 210-225-6235

Counsel for Amador

/s/ Daniel Barks

Daniel D. Barks, *pro hac vice*

ddb@speiserkrause.com

Speiser Krause, P.C.

5555 Glenridge Connector, Suite 550

Atlanta, GA 30342

Office 571-814-3344

Fax 866-936-6382

Counsel for Holcombe

/s/ Mark Collmer

Mark W. Collmer

mark@collmerlaw.com

Texas Bar No. 04626420

Collmer Law Firm

3700 Montrose

Houston, TX 77006

Office 713-337-4040

Counsel for Holcombe

/s/ Dennis Peery

Dennis Charles Peery

d.peery@tylerpeery.com

Texas Bar No. 15728750

R. Craig Bettis

cbettis@tylerpeery.com

Texas Bar No. 24040518

Tyler & Peery

5822 West IH 10

San Antonio, TX 78201

Office 210-774-6445

Counsel for Uhl

/s/ Tim Maloney

Tim Maloney

Texas Bar No. 12887380

timmaloney@yahoo.com

Paul E. Campolo

pcampolo@maloneyandcampolo.com

Texas Bar No. 03730150

Maloney & Campolo, L.L.P.

926 S. Alamo

San Antonio, TX 78205

Office (210) 465-1523

Counsel for Ramsey

/s/ George LeGrand

George LeGrand

tegrande@aol.com

Texas Bar No. 12171450

Stanley Bernstein

Texas Bar No. 02225400

LeGrand & Bernstein

2511 N. Saint Mary's St.

San Antonio, Texas 78212

Office 210-733-9439

Fax 510-735-3542

Counsel for Wall & Solis

/s/ Joseph M. Schreiber

Joseph M. Schreiber

joe@lawdoneright.net

Texas Bar No. 24037449

Erik A. Knockaert

erik@lawdoneright.net

Texas Bar No. 24036921

Schreiber | Knockaert, PLLC

701 N. Post Oak Rd., Suite 325

Houston, TX 77024

Phone (281) 949-8904

Fax (281) 949-8914

Counsel for Brown

/s/ Justin Demerath

Justin Demerath

jdemerath@808west.com

Texas Bar No. 24034415

O'Hanlon, Demerath & Castillo

808 West Ave.

Austin, TX 78701

Office 512-494-9949

Counsel for Corrigan, Braden,

Warden, Stevens, Pachal, McCain, &

Poston

/s/ Jason Webster

Jason Webster

jwebster@thewebsterlawfirm.com

Texas Bar No. 24033318

The Webster Law Firm

6200 Savoy

Suite 640

Houston, TX 77036

Counsel for Lookingbill

/s/ Brett Reynolds

Brett T. Reynolds

btreynolds@btrlaw.com

Texas Bar No. 16795500

Brett Reynolds & Associates, P.C.

1250 N.E. Loop 420, Suite 420

San Antonio, TX 78219

(210) 805-9799

Counsel for Workman, Colbath, and
Harris

/s/ Marion M. Reilly

Marion M. Reilly

Hilliard Munoz Gonzales, L.L.P.

719 S. Shoreline - Ste 500

Corpus Christi, TX 78401

(361) 882-1612

(361) 882-3015 (fax)

marion@hmgllawfirm.com

Counsel for McMahan

/s/ Hugh J. Plummer

Hugh J. Plummer

hplummer@thomasjhenrylaw.com

Law Office of Thomas J. Henry

4715 Fredricksburg

San Antonio, TX 78229

(210) 585-2151

(361) 985-0601 (fax)

Counsel for McMahan

/s/ Kelly W. Kelly

Kelly W. Kelly

Anderson & Associates Law Firm

2600 SW Military Drive, Suite 118

San Antonio, TX 78224

(210) 928-9999

(210) 928-9118 (fax)

kk.aalaw@yahoo.com

Counsel for Ward

/s/ Craig Carlson

Craig Carlson

ccarlson@carlsonattorneys.com

Philip Koelsch

pkoelsch@carlsonattorneys.com

Joe Craven

jcraven@carlsonattorneys.com

The Carlson Law Firm

100 E Central Texas Expy

Killeen, TX 76541

254-526-5688

Counsel for Rios

CERTIFICATE OF SERVICE

I certify that the foregoing was filed through the Court's CM/ECF system on March 11, 2021, and the following counsel for the United States have received notice and been served through that system.

/s/ Jamal K. Alsaffar

Jamal K. Alsaffar

Janet E. Militello
Brandon Renken
LOCKE LORD LLP
2800 JPMorgan Chase Tower
600 Travis Street
Houston, Texas 77002-3095

David M. Pritchard
Kevin M. Young
PRITCHARD YOUNG LLP
10101 Reunion Place, Suite 600
San Antonio, Texas 78216

BRIAN BOYNTON
Acting Assistant Attorney General
Civil Division

JOHN PANISZCZYN, Civil Chief
United States Attorney's Office
Western District of Texas

ASHLEY C. HOFF
United States Attorney
Western District of Texas

JAMES G. TOUHEY, JR.
Director, Torts Branch
United States Dept. of Justice
Civil Division

KIRSTEN WILKERSON
Assistant Director, Torts Branch
United States Dept. of Justice
Civil Division

STEPHEN E. HANDLER
Senior Trial Counsel, Torts Branch
United States Dept. of Justice
Civil Division

PAUL DAVID STERN
Trial Attorney, Torts Branch
United States Dept. of Justice
Civil Division

STEPHEN TERRELL
Trial Attorney, Torts Branch
United States Dept. of Justice
Civil Division

CLAYTON R. DIEDRICHS
Assistant United States Attorney

JAMES E. DINGIVAN
Assistant United States Attorney

JIM F. GILLIGAN
Assistant United States Attorney

JACQUELYN M. CHRISTILLES
Assistant United States Attorney

KRISTIN K. BLOODWORTH
Assistant United States Attorney